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February 8, 2013

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

***Via Electronic Filing***

**Re: MB Docket No. 09-182, 2010 Quadrennial Review – Review of the Commission’s Broadcast Ownership Rules and Other Rules Adopted Pursuant to Section 202 of the Telecommunications Act of 1996; MB Docket No. 07-294, Promoting Diversification of Ownership in the Broadcasting Services**

Dear Ms. Dortch:

On February 6, 2013, I spoke by telephone with Alex Hoehn-Saric, Policy Director for Commissioner Rosenworcel, regarding matters in the above-captioned dockets. I reiterated our longstanding view that changes to the Commission’s cross-ownership rules would violate the Third Circuit’s instruction to analyze – *before* making any changes – the impact of such shifts on broadcast ownership opportunities for women and people of color. No inclination the Commission may have to “simply” relax the rules can justify the presently proposed changes prior to rigorous study regarding their likely effect.

As we have indicated repeatedly, the Commission must not allow more consolidation if it hopes to prevent further decreases in ownership diversity. Allocating funds now for future research of these questions could not possibly satisfy the mandates of *Prometheus II*. Neither would changing the standards reportedly spelled out in the draft item for allowing newspaper-television cross-ownership in the nation’s very largest TV markets. Whatever the Commission may attempt in order to allay concerns about acquisitions by stations that move in and out of the top-four rankings, these steps could not possibly satisfy that court’s requirements for progress towards fulfillment of the Commission’s own diversity goals.

We file this *ex parte* notice today, pursuant to Section 1.1206(b) of the Commission’s rules. If you have any questions regarding this submission, please do not hesitate to contact me.

Respectfully submitted,

/s/ Matthew F. Wood

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